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April 15, 2004

VIA ELECTRONIC FILING SYSTEM

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: TMP Corp. and TMP Jacksonville, LLC
Supplement to Request for Further Extension of TTY Requirements
& First Quarter 2004 TTY Status Report, CC Docket No. 94-102

Dear Ms. Dortch:

On June 4, 2002, TMP Corp. and TMP Jacksonville, LLC (collectively the "TMP Carriers") submitted a petition seeking waiver of Section 20.18(c) of the Commission's Rules and the June 30, 2002 deadline for compliance with 911 text telephone ("TTY") obligations for digital wireless carriers ("Petition").¹ On June 28, 2002, the Commission granted the Petition and extended the deadline for the TMP Carriers to June 30, 2003.² On June 27, 2003, the TMP Carriers submitted a Request for Further Extension of TTY Requirements to request a further extension of the TTY deadline until June 30, 2004.³

The TMP Carriers, by counsel, hereby supplement their Request for Further Extension of TTY Requirements to request a further extension until November 24, 2004, by which to comply with TTY obligations. As previously reported in the Request for Further Extension, the TMP

¹ 47 C.F.R. § 20.18(c) (the "TTY Rule"); *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems: Fourth Report and Order*, CC Docket No. 94-102, FCC 00-436 (rel. Dec. 14, 2000) ("Fourth Report and Order").

² See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order, DA 02-1540 (rel. June 28, 2002) ("Order") at paras. 6 & 17. In its Order, the Commission granted the TMP carriers' request for a one-year extension. *Id.* The Appendix to the decision, however, erroneously stated that the extension was granted only through January 31, 2003. See *id.* app. A: *TMP Corp. TTY Status Report* (October 15, 2002). Commission staff confirmed that the June 30, 2003 date is the correct extension deadline.

³ See *TMP Corp. and TMP Jacksonville, LLC, Request for Further Extension of TTY Requirements*, CC Docket No. 94-102, filed June 27, 2003.

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Carriers began investigating the possibility of replacing the Tecore switch used by Airmet with one that is TTY-compliant upon discovery that Airmet would not have a timely and economically feasible solution available. As reported in the companies' third quarter 2003 and fourth quarter 2003 status reports, the TMP Carriers received a bid from the switch vendor Nortel that satisfied the criteria established by the companies' primary lender, the Rural Utilities Service ("RUS"), and have accepted such bid from Nortel.⁴ Nortel indicated to the companies that, after receiving the purchase orders, it would take approximately 90-120 days to complete installation of the switch.⁵ The companies' initially anticipated, therefore, that installation of the switch would be completed by the requested June 30, 2004 extension date.

In late February, however, Nortel informed the TMP Carriers that the earliest in-service date available for the new switch would be September 4, 2004. Accordingly, to accommodate some slippage and testing requirements, the TMP Carriers seek an extension until November 24, 2004 to meet the TTY obligations.⁶

The TMP Carriers would also like to report that TMP Corp. recently acquired an additional license in the Galesburg, IL (BTA 161) market. This license utilizes the same Tecore switch and will also be converted to the Nortel switch when installation is complete.

Based on the foregoing, the TMP Carriers respectfully request that the Commission grant this request for further extension until November 24, 2004.

Sincerely,



Sylvia Lesse
Terri Granison

Attachment

cc: Blaise Scinto, Chief, Policy Division, Wireless Telecommunications Bureau
Pam Gregory, Consumer & Governmental Affairs Bureau
Mindy Littell, Policy Division, Wireless Telecommunications Bureau
Qualex International

⁴ See TMP Corp. and TMP Jacksonville, LLC, Joint TTY Status Report, filed October 15, 2003; TMP Corp. and TMP Jacksonville, LLC, Joint TTY Status Report, filed January 15, 2004.

⁵ See TMP Corp. and TMP Jacksonville, LLC, Joint TTY Status Report, filed January 15, 2004.

⁶ See also In the Matter of Telephone Number Portability, TMP Corp. and TMP Jacksonville, LLC, Petition for Waiver of Section 52.31 (a), CC Docket 95-116, pp. 2-3, filed March 23, 2004, for a general discussion of the delay associated with Nortel's installation of the new switch.

DECLARATION

I, Trey Lutrick, CEO of TMP Corp. and TMP Jacksonville, LLC, (the "TMP Carriers") do hereby declare under penalty of perjury that I have read the foregoing "Supplement to Request for Further Extension of TTY Requirements & First Quarter 2004 TTY Status Report," and that the information contained therein that pertains to the TMP Carriers is true and accurate, to the best of my knowledge, information and belief.


Trey Lutrick, CEO

Dated: 04/15/04